

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

April 10, 2008

Mr. Mark Paris Basic Remediation Company (BRC) 875 West Warm Springs Henderson, NV 89011

Re.: Nevada Division of Environmental Protection Response to: Sewer Alignment Excavation Soil Sampling and Analysis Plan dated April 9, 2008 NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's document identified above and finds that the document is acceptable with the following conditions and comments:

- 1. Conceptual Site Model, Page 2, the NDEP has the following comments:
 - a. This Conceptual Site Model (CSM) lacks the necessary detail. The format and content of future CSMs is expected to be discussed during a meeting scheduled for April 16, 2008.
 - b. For the purposes of this Sampling and Analysis Plan (SAP), the NDEP reviewed pertinent documentation previously submitted by BRC in order to fully understand the CSM for this sub-area. This will not be done in the future.
 - c. Please note that maintenance workers must be evaluated as part of the risk assessment for this sub-area.
- 2. Scope of Work, Sampling Location and Depths, page 3, the NDEP requests that samples also be collected at the 10' below ground surface (bgs) depth interval as well as in the capillary fringe. This data will be collected to assist in the evaluation of the leaching pathway. The NDEP requests that the sample locations for these deeper samples correspond to the surface soil samples, however, it is not necessary to collect deeper samples at every location. NDEP requests that deeper samples be collected wherever a shallow sample penetrates an existing pond. It is also requested that two samples be collected within the Spray Wheel area. It is requested that a revised Figure 3 be provided to the NDEP that shows the locations of these deeper samples. This Figure should be provided before the initiation of field work.
- 3. Scope of Work, Reporting, it is also noted that the final report to the NDEP will evaluate the potential for leaching of contaminants to groundwater.
- 4. Table 1, PCB analysis by Method 1668 (including the analysis of PCB 209) must be completed as part of this SAP.

Please note that (except as noted above) no response is required to this letter. Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2850 x247 or brakvica@ndep.nv.gov.

Sincerely,

Brian A. Rakvica, P.E. Supervisor, Special Projects Branch Bureau of Corrective Actions

BAR:s

cc: Jim Najima, NDEP, BCA, Carson City

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